

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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| UNITED STATES OF AMERICA | § | |
| V. | § | Criminal No. 3:17-cr-169 |
| SAID AZZAM MOHAMAD RAHIM | § | Judge Jane J. Boyle |

**DEFENDANT SAID AZZAM MOHAMAD RAHIM'S FIRST SUPPLEMENTAL
MOTION IN LIMINE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the Defendant, SAID AZZAM MOHAMAD RAHIM, by and through undersigned counsel and files this, his First Supplemental Motion in Limine asking the Court to order the United States Government not to sponsor any testimony from any witness or offer any evidence until such time as they approach the bench and request a hearing outside the presence of the jury to determine the admissibility of evidence on the following:

1. The Defendant hereby re-urges and incorporates by reference each and every item contained within his previously filed Motion in Limine [Doc. 87], filed on April 12, 2019. Without waiving or abandoning those items, Defendant would supplement his Motion with the following specific items:
2. Any and all reference to the bombings that occurred in Sri Lanka on or about Sunday, April 28, 2019. This request includes but is not limited to the effects of these bombings, the alleged perpetrators of the bombings, or the number of individuals killed or injured as a result. Such testimony or evidence would be

wholly irrelevant to the issues at trial and would be exceptionally prejudicial to Defendant Rahim.

3. Any and all references or testimony regarding specific acts of violence committed by ISIS, or any other organization, that is not at issue in this case. This includes, but is not limited to accounts of individuals being tortured, beheaded, burned, etc.

II.

WHEREFORE, Defendants respectfully prays that their Motions in Limine be granted. Further, Defendant respectfully prays that the Court instruct the government not to sponsor any of the above testimony or evidence from any witness until such time as they approach the bench and request a hearing outside the presence of the jury to determine the admissibility of such evidence.

Respectfully submitted,

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COUNSEL FOR DEFENDANT
SAID AZZAM MOHAMAD RAHIM

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing motion was delivered to Errin Martin, the Assistant United States Attorney in charge of this case, via CM/ECF, on this the 23rd day of April 2019.

/s/ James P. Whalen
JAMES P. WHALEN